

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

IN RE:	: CASE NO: 16-12962-JDW
	: CHAPTER: 13
	:
RANDALL B TILLEY	:
SHERRIE R TILLEY,	:
	:
Debtors.	:
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RANDALL B TILLEY	:
SHERRIE R TILLEY,	:
	:
Movant,	: CONTESTED MATTER
	:
vs.	:
	:
AMERISAVE MORTGAGE	:
CORPORATION,	:
	:
Respondent.	:

**RESPONSE TO OBJECTION TO NOTICE OF MORTGAGE PAYMENT CHANGE OF THE
AMERISAVE MORTGAGE CORPORATION [DKT. #88]**

COMES NOW Amerisave Mortgage Corporation, for itself, its successors and/or assigns ("Respondent"), and shows this Honorable Court that, for the reasons set out below, the Court should deny the Debtors' Objection to Notice of Mortgage Payment Change of the Amerisave Mortgage Corporation [Dkt. #88] ("Objection"):

1.

Respondent filed a Notice of Mortgage Payment Change on March 6, 2019 (Dkt. #88) listing a new post-petition payment amount of \$1,635.16 effective with the May 1, 2019 payment. The Debtors filed an Objection to the Notice stating the payment amount was increasing too high due to the hazard insurance being listed incorrectly in the escrow analysis filed with the Notice.

2.

Respondent requests additional time to review its accounting in order to resolve the issues

raised in the Debtors' Objection.

WHEREFORE, Respondent, for itself, its successors and/or assigns, prays that this Court inquire as to the matters raised herein and deny the Debtors' Objection to Notice of Mortgage Payment Change of the Amerisave Mortgage Corporation [Dkt. #88] and enter such orders and require such further inquiry as may appear appropriate to the Court.

Date: 8/8/2019

/s/ Natalie Brown
Natalie Brown
MS State Bar No. 100802
Rubin Lublin, LLC
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Attorney for Respondent

CERTIFICATE OF SERVICE

I, Natalie Brown of Rubin Lublin, LLC certify that on the 8th day of August, 2019, I caused a copy of the Response to Objection to Notice of Mortgage Payment Change of the Amerisave Mortgage Corporation [Dkt. #88] to be filed in this proceeding by electronic means and to be served by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to the said parties as follows:

Randall B Tilley
109 Strickland Cove
Byhalia, MS 38611

Sherrie R Tilley
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Kevin F. O'Brien, Esq.
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Locke D. Barkley
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U.S. Trustee
501 East Court Street
Suite 6-430
Jackson, MS 39201

Executed on 8/8/19

By: /s/ Natalie Brown
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